

Iowa Statewide Emergency Solutions Grant (ESG)

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Introductions

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Iowa Finance Authority 101



History

- 1975 Iowa Housing Finance Authority created
- 1977 Iowa Supreme Court Grubb
- 1980 FTE = 8
- 1986 Title Guaranty Division created
- 1987 SRF created
- 1989 FTE = 20
- 2000 HUD Section 8 PBCA Awarded
- 2002 FTE = 79



History

- 2004 Several programs added
 - Senior Living Revolving Fund
 - Home & Community-Based Services Revolving Loan Fund
 - Home & Community-Based Rent Subsidy
 - Aftercare Rent Subsidy
- 2008 Iowa Council on Homelessness codified
- 2010 HOME program moves to IFA from IDED
- 2013 Iowa Ag Development Authority becomes IADD at IFA



IFA Today

- \$2.6 Billion assets under management
- Approximately 40 programs
- 92 FTEs



Perspective: Largest Iowa-Based Financial Institutions

Institution Name	City	Total Assets (\$000)
Bankers Trust Company	Des Moines	\$3,306,863
lowa Finance Authority	Statewide	\$2,637,603
Principal Bank	Des Moines	\$2,451,847
Hills Bank and Trust Company	Hills	\$2,116,753
MidWestOne Bank	lowa City	\$1,773,485
MetaBank	Storm Lake	\$1,738,004
Dubuque Bank and Trust	Dubuque	\$1,436,744
West Bank	West Des Moines	\$1,424,074
United Bank of lowa	Ida Grove	\$1,239,784
Quad City Bank and Trust	Bettendorf	\$1,233,332
Bank lowa	West Des Moines	\$1,164,460







Overview

Core Program Areas:

- Affordable Rental
- Affordable Homeownership
- Iowa Title Guaranty
- Community Development
- Water Quality
- Iowa Agricultural Development Division (7.1.13)





Affordable Homeownership

The Iowa Finance Authority helps approximately 1,000 Iowa home buyers realize their dream of homeownership each year.

Iowa Finance Authority administers Iowa's allocation of federal tax exempt private activity bond volume cap to invest in mortgage backed securities & provide tax credits for qualified Iowa home buyers.

Homeownership Activities include:

- Low-Cost First Mortgage Financing
- Mortgage Credit Certificates
- Entry Cost Subsidies (including Military Homeownership Assistance)





Affordable Rental

Project-Based Section 8

- Oversight of 223 Section 8 properties
- Serves 12,000 low-income lowans in 73 counties

HOME Program

- Administrator since July, 2010
- Rental
- Homeownership
- Tenant-Based Rental Assistance

Federal Housing Tax Credit Program

- Since 1986
- Invested in 600 properties and 23,000 units throughout lowa



Affordable Rental

State Housing Trust Fund

- Local Housing Trust Fund Program
- Project-Based Housing Program
- \$3.48 in other funds leveraged for every \$1 of SHTF funding

Homelessness Program

- Emergency Solutions Grant
- Housing Opportunities for Persons with AIDS
- Shelter Assistance Fund

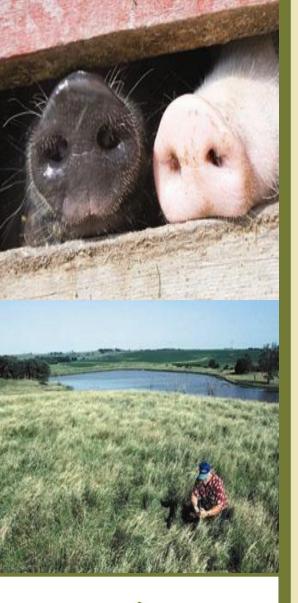




IOWA FINANCE AUTHORITY

Iowa Title Guaranty

- Created by the Iowa Legislature in 1986
- Helps assure integrity of the Land Title System
- Successful public/private partnership with
 - 1,118 participating attorneys
 - 190 abstractors
 - 267 escrow closers
 - Coverage for 1,343 lenders



Agricultural Development

- Beginning Farmer Loan Program
- Beginning Farmer Tax Credit Program
- Custom Farming Tax Credit Program
- Loan Participation Program







State Revolving Fund

- Low interest loans for public water and wastewater infrastructure
 - 1.75% interest
- Over \$2.3 billion in total loans closed since programs began
- Approximately 500 different borrowers (cities, counties, sanitary districts, municipal utilities) have benefited from the SRF
- Provides low-cost funds for nonpoint source water quality projects

IowaHousingSearch.org





Connect!

IowaFinanceAuthority.gov



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What is ESG?



The Purpose of the ESG Program

- To assist people to quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness.
- https://www.onecpd.info/esg/



Basic ESG Facts

- A federal program of the U.S. Department of Housing and Urban Development (HUD).
- Formula grants to states and some metropolitan cities.
- Authorization: McKinney Vento Act; 2009 Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act—along with the Continuum of Care Program.



"Performance Indicators" of the HEARTH Act

- Length of time homeless
- Recidivism (subsequent return to homelessness)
- Access/coverage (thoroughness in reaching persons who are homeless)
- Overall reduction in number of persons who experience homelessness
- Job and income growth for persons who are homeless
- Reduction in first time homeless
- Other accomplishments related to reducing homelessness



ESG Program Planning

- Formula grantees (states and localities) required to submit a Consolidated Plan to HUD every five years for a collection of programs—Community Development Block Grant, HOME Opportunities Investment Program, Housing Opportunities for Persons with AIDS, and ESG.
- Also required to submit Annual Action Plans every year that update the Consolidated Plan.
- Required to solicit community input and feedback for all stages of the process.
- Also now required to consult with the applicable Continuum of Cares (CoC) in a jurisdiction. For IFA's ESG program, that is mostly the Iowa Balance of State.
- The decision-making body the Iowa Balance of State CoC is the Iowa Council on Homelessness.
- IFA therefore consults with the council regarding the ESG program.



Types of Assistance

- Street Outreach
- Shelter
- Homelessness Prevention
- Rapid Rehousing



Street Outreach

- Essential services for unsheltered homeless persons
 - Connecting persons with emergency shelter, housing, or critical services.
 - Providing urgent, non-facility-based care to unsheltered homeless persons who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility.
 - Engagement, case management, emergency health services, emergency mental health services, transportation.



Shelter

- Essential Services for clients
 - Case management, child care, education services, employment assistance and job training, outpatient health services, legal services, life skills training, mental health services, substance abuse treatment, transportation, and services for special populations
- Operations for Emergency Shelters
 - Maintenance, rent, security, fuel, equipment, insurance, utilities, food, furnishings, and supplies
 - Can also include hotel or motel voucher if no emergency shelter available



Transitional Housing (Shelter)

- Interim Regulations define Emergency Shelter to include a "hold harmless" provision for transitional shelter/housing projects, if certain conditions are met.
- Essentially such projects are "grandfathered in" for eligibility as Emergency Shelters.



Homelessness Prevention and/or Rapid Rehousing

- Rental Assistance
- Housing Relocation and Stabilization Services
 - Financial assistance costs
 - Short/Medium term rental arrears, rental application fees, security deposits, last month's rent, utility deposits, utility payments, moving costs
 - Services costs
 - Housing search and placement, housing stability case management, mediation, legal services, credit repair



The Iowa Statewide ESG Program



ESG in Iowa

- In Iowa, three total federal grants are typically made each year: one to the state, one to Des Moines, and one to Sioux City.
- The Iowa Finance Authority is responsible for Iowa's state allocation of funds.
- 25 subgrantees for 2015
- More than \$2.5 million total
- ESG programs providing:

Street Outreach: 2

- Shelter: 20

Rapid Rehousing: 15

Homelessness Prevention: 12



ESG and the Shelter Assistance Fund (SAF)

- The State Shelter Assistance Fund (SAF) is another source of funding for shelters, also managed by the Iowa Finance Authority.
- SAF rules changed in 2014: better match the SAF legislation; focused on supporting Shelter
- SAF in 2015: 25 grantees/approximately \$830k
- Agencies may apply for/receive either ESG or SAF, but not both



Program Requirements: Termination of Assistance

• Establish and implement a formal notification and appeals process for the termination of assistance to individuals or families who violate program requirements, in accordance with the minimum standards of 24 CFR Part 576.402, the federal ESG Rules and Regulations.



Program Requirements: Access to Mainstream Services and Resources

 All program participants are assisted, to the maximum extent practicable, in obtaining mainstream services and financial assistance, including housing, health, social services, employment, education, and youth programs for which participants may be eligible.



Program Requirements: Accessibility

• Ensure that the grant-funded program or activity is readily accessible to and usable by individuals with disabilities, including providing reasonable accommodations so that individuals with disabilities have an equal opportunity to participate.



Program Requirements: Coordination with Other Homeless Services

• Coordinate and integrate, to the maximum extent practicable, grant-funded activities with other homeless service programs in the community.



Program Requirements: Requirements for Religious Organizations

 Prohibited from engaging in religious proselytizing or counseling, utilizing ESG funds, or requiring attendance at religious services as a requirement or condition to receive services, or limiting services or giving preference to persons on the basis of religion.



Program Requirements: Coordinated Intake/Assessment

Required to participate in a coordinated intake/assessment system, beginning
when the HUD-recognized Continuum of Care operating in the Recipient's
geographic area has developed and implemented a system that meets the
minimum requirements of HUD's Continuum of Care Interim Rule for such systems.
 Such a system must include provisions to meet the separate requirements of
recipients that are victim service providers.



Program Requirements: Involvement of Homeless Individuals

 To the maximum extent possible, involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted with ESG funds, in providing services assisted with ESG funds, and in providing services for occupants of facilities assisted with ESG funds.



Program Requirements: Minimum Written Standards for Determining Assistance

- Cities must develop and apply the same standards for all ESG programs
- States may apply the same standards, or they may require all ESG programs to develop their own standards
- IFA currently requires ESG programs to develop and apply their own standards
- Must be written
- Applied consistently

Review Form:

- Which standards apply to your agency/program?
- Which do you have in place already?
- Which do you need to develop/refine?
- Other considerations?



Client Files



Client File Checklists

- What are the key points?
- What is missing?
- What is different from your agency's forms?
- What should be changed?



Release of Information Notice of Data Collection

- What are your agency's ROI policies?
- Does your agency provide notice that IFA and/or HUD may have access to client information for program monitoring?
- If not using the HMIS Notice of Data Collection form, is your agency using an alternate DV form?
- Other considerations?



Participant Eligibility: Homeless/At-risk

- Definition of Homelessness/Definition of At-Risk
 - Four categories of Homelessness; three of At-Risk; note which one the client qualifies under in the client file
- Documenting Homeless/At-Risk status
 - What are the key points?
 - What should go in the client file?
 - What's different for HP or RRH?
 - What's different about shelters?



HP & RRH Participant Eligibility: Income

- Note difference in HP and RRH income requirements
- Income eligibility not required for shelter
- Note income exclusions—such as income of minor children
- Income Eligibility Form & Zero-Income Affidavit
 - What are the key points?
 - What is missing?
 - What is different from your agency's forms?
 - What should be changed?
 - What other forms should be added?



HP & RRH Participant Eligibility: Income (cont.)

Income requirements

- Documenting Area Median Income
- Third-party verification of income: obtain client release to contact employer if necessary
- Self-declaration of income
- Zero-income affidavit
- Certification/recertification



HP & RRH Unit Eligibility: Habitability

- Required for all HP, RRH:
 - Habitability inspections
 - Don't have to be HUD-certified
 - Different from Housing Quality Standards (for Section 8 and similar programs)
 - HQS more stringent in most areas (exception of fire safety)



HP & RRH Unit Eligibility: Lead Paint

- Required for all HP, RRH:
 - Lead-based paint inspections (some exceptions)
 - Only if unit built before 1978 AND
 - Child under six or pregnant women will live there
 - Some other exceptions (such as SRO)
 - Take short online training to become certified visual inspector (hour or so)



HP & RRH

Unit Eligibility: Habitability and Lead, Continued

Review forms:

- What are the key points?
- What is missing?
- What is different from your agency's forms?
- What should be changed?
- What should be added?



HP & RRH Unit Eligibility for Rental Assistance: FMR

- Required for all HP & RRH Rental Assistance:
 - Fair Market Rent
 - Different from Rent Reasonableness—both are required
 - FMR includes the utility allowance already—so make sure to include utility with the rent when comparing the unit total rent with FMR!!!!
 - Document the applicable county FMR in the client file



HP & RRH Unit Eligibility for Rental Assistance: Rent Reasonableness

- Required for all HP & RRH Rental Assistance:
 - Rent Reasonableness (in addition to FMR)
 - Find three comparable units
 - Try IowaHousingSearch.org to locate comparables
 - Try to match up as many important characteristics as possible; make sure to add utility allowance as applicable
 - Proposed new Iowa ESG policy: average of three comparables must not be more than 10% above the proposed unit rent



HP & RRH Unit Eligibility for Rental Assistance: Cost (cont.)

Review form:

- What are the key points?
- What is missing?
- What is different from your agency's forms?
- What should be changed?
- What should be added?



HP & RRH Unit Eligibility for Rental Assistance: Landlords

- Required for all HP & RRH Rental Assistance:
 - Landlord agreements—written
 - Leases—written (exception only for arrears, can be oral)
 - Not the same thing!
 - Landlord agreements are between the landlord and agency; leases between the client and landlord
 - Landlord agreements must contain some key information—including that the landlord must notify the agency of any eviction action against the client



HP & RRH Unit Eligibility for Rental Assistance: Landlords (cont.)

Review form:

- What are the key points?
- What is missing?
- What is different from your agency's forms?
- What should be changed?
- What should be added?



All Programs: Fair Housing

- Applies to all housing assisted under ESG
- Applies to all Shelters assisted under ESG
- Review posters
 - Does your agency already have these posted?
 - What locations should these be posted (multiple outreach locations, offices)?



Shelters: Some Key Requirements

- Habitability: Should document that shelter meets habitability requirements. Same requirements as for HP/RRH, with the addition of Accessibility. Document at least annually.
- Fire safety: Some particular requirements for fire safety. Include plan for hearing-impaired residents (mobile unit is okay).
- Accessibility: Should have a plan. If the shelter facility is not wheelchair-accessible, for example—have a plan for an alternate location for a client to receive services, such as a partner agency or hotel/motel.
- Lead-based paint: Should document that shelter has been regularly inspected (visual) for lead-paint (annually).
- Prohibition against involuntary family separation. The age of a child under age 18 must not be used as a basis for denying any family's admission to emergency shelter.



(All Programs)

Termination of Assistance

- Have a written policy for termination of assistance
- Have a written appeals policy: some particular requirements
 - appeal must be possible to someone other than the person who made the initial determination, or anyone that person supervises
- Ideal: clients sign that they have received notice of both



(All Programs)

Record of Clients Denied Services

- Must keep a written record of clients denied services
- Not necessary if a program is full and therefore not accepting clients
- Only necessary if a client is denied services because they do not meet eligibility or other program requirements



Monitoring



Monitoring

- Goals
 - Increase program knowledge, understanding, compliance with regulations
 - Learn more about individual programs
 - Meet HUD's requirements for monitoring
- Desk monitoring
 - With every draw
 - We will be in touch with any questions we have
 - May disallow expenses in some cases
- On-site visits
 - At least every two-three years



Monitoring: On-site Visits

What to expect:

- Typically we arrange in advance, some flexibility if necessary
- Select random sampling of client files on site—usually around 10%, depending on total number of clients—usually around 5 total files
- Select additional agency documentation for review: last month financial statements, board meeting minutes for the past year, recent audit/financial review, financial policies/procedures, program policies, personnel policies
- If a shelter, will include a habitability inspection
- May last three-four hours total
- Include interviews with program staff, financial staff, case manager, and often a client (arranged by the agency)
- Agency staff not required to be present for entire visit—most of visit is spent reviewing files and documentation



Monitoring Visit Follow-up

- We issue a letter detailing:
 - Findings: noncompliance with regulations
 - Concerns: issues that may lead to noncompliance
 - Recommendations: lesser concerns, suggestions for changes
- Letter will include:
 - An overview of what the visit found
 - Specific steps required
 - Timeline to complete follow-up steps
- If follow-up steps are completed:
 - In most cases, any findings or concerns are closed.



Monitoring Workbook

- Review workbook
 - What are the key areas monitored?
 - Who from your program would need to be involved?
 - Any surprises?



Financial Management



Budget Revision Form

- Review form
 - What programs need to complete this?
 - How does the form relate to the original application budget?
 - What are the key points?
 - When/where should this be submitted?



Draw Cover Form

- Review form:
 - What is different/similar to past years' forms?
 - How does it relate to overall draw package?
 - What information should be included?
 - When/where should this be submitted?



Draw Itemization Form

- Review form:
 - How is this different from the draw cover form?
 - How does it relate to overall draw package?
 - What information should be included?
 - When/where should this be submitted?



Data Reports with Draws

- Goals:
 - Data completeness
 - Data quality
 - Data timeliness
- Review sample report
 - How is this report obtained?
 - When/where should this be submitted?
 - How does it relate to the overall draw package?



Draws: Timesheets

Timesheets

- Should include totals of hours worked on ESG program, for each staff member
- Should be signed by staff member and supervisor (electronic timesheets okay also)
- If not included on the timesheets, need additional documentation that indicates the cost of the staff members' time (payroll reports, for example)



Draws: Receipts

Receipts

- Should be legible
- Should be itemized
- Should clearly indicate which items were paid with ESG
- Should indicate a date expenses were incurred—within the time frame of the grant



Draws: Indirect Expenses

Indirect Expenses

- Can be claimed in any category
- Different from Administrative expenses
- Best if agency first obtains an approved federal indirect cost rate from the agency's "cognizant" federal agency (largest grantor)
- Approved rates vary by agency, include different things
- Must ensure not to double count by billing expenses directly that are already included in the indirect cost rate agreement
- If an agency wants to claim indirect expenses, should work with IFA staff first to ensure they understand requirements



Draws: Match

Match

- Federal ESG requirement is 100% match
- Requirement is at grant (IFA) level
- IFA passes on the requirement to subgrantees in order to meet it
- This year, will only require 75% match from subgrantees—25% portion offset at grant (IFA) level by the Shelter Assistance Fund program
- May in future look at different arrangement to allocate this benefit to ESG subgrantees, according to different levels of agency difficulty obtaining match—but this was a way to transfer some benefit to agencies immediately this year
- Match can be cash or in-kind
- Match contribution must further the ESG goals, and meet all ESG requirements
- Must document source of match (often a grant contract for another grant, or a record of volunteer hours, or a record of the value of a building)
- Don't currently require documentation in each draw request of how the match was used to further the ESG program—but MAY require this periodically, or review this during on-site visits



Draws: Math

Math

- Double-check that the forms added your numbers right
- Double-check that the Draw Cover Form and Draw Itemization Form totals match
- Double-check that all documentation is in the same order as the forms
- If an expense has already been paid in one category, can't change the category later on (HUD treats as separate accounts that we draw from)
- If you're not sure what your current totals are in each category, ask
 Judy!



Review: Sample Draw Documentation

- Review sample draw documents
 - Is the documentation sufficient?
 - Are the expenses eligible?
 - How/where would it be recorded in the draw worksheets?
 - How would the packet be organized?
 - When/where would it be submitted
 - Is anything missing?



Submitting Draws

- Submit to Judy by mail, email, or fax (if fax, make sure to note that it is for Judy, or Homeless Programs)
- Submit at least quarterly
- May submit monthly
- Deadlines: end of month following end of quarter
- Should include all applicable expenses for that quarter—we may refuse draws submitted late
- Submit final draw by end of January of following year

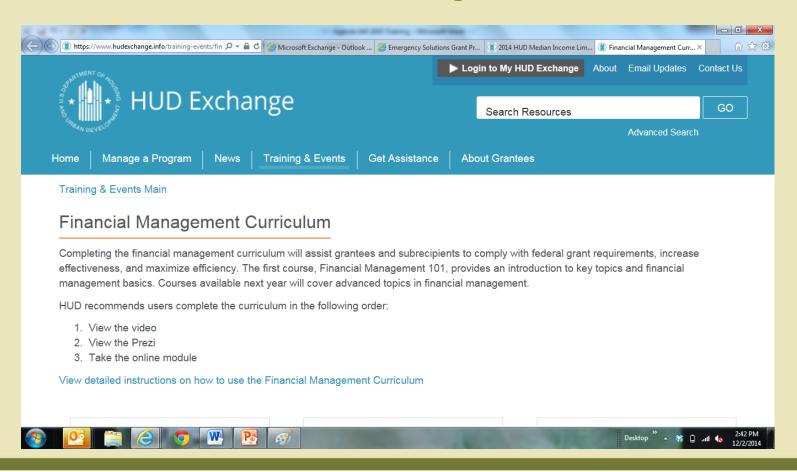


Budget Revisions

- Will usually accept budget revisions, in advance
- Any changes between major categories (Street Outreach, Shelter, HP, RRH, Data, or Admin); also between subcategories—HUD requires that we track each of them separately
- If within a subcategory (example, from paying utilities for a shelter to paying for pest management for a shelter, not necessary—all Shelter Operations)

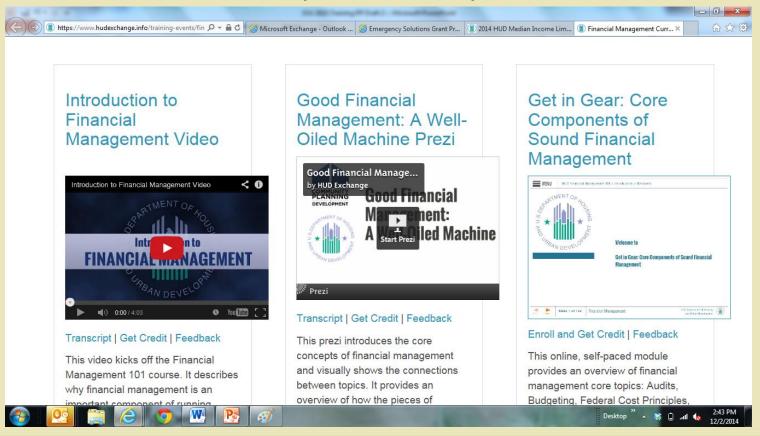


New HUD Financial Management Curriculum





New HUD Financial Management Curriculum (continued)





Contracts

- Due back within 45 days of receipt; include additional documents sent with the contract
- Let us know if there is a reason more time is needed for an item
- Shelters: need documentation of local government approval—signed one-page form; HUD doesn't provide detail on anything more this needs to include—just that the local government is aware of and supports the shelter providing services in that locality through ESG



Record Retention

 Maintain books, records and documents in sufficient detail to demonstrate compliance for a period of 5 years beyond the end of the grant period.



Conflict of Interest

Some key points:

- ESG assistance may not be conditioned on an individual's or family's acceptance or occupancy of
 emergency shelter or housing owned by the Recipient, or a parent or subsidiary of the Recipient. No
 Recipient may, with respect to individuals or families occupying housing owned by the Recipient, or
 any parent or subsidiary of the Recipient, carry out the initial evaluation required.
- No person who exercises or has exercised any functions or responsibilities with respect to activities assisted under the ESG program, or who is in a position to participate in a decision-making process or gain inside information with regard to activities assisted under the program, may obtain a financial interest or benefit from an assisted activity; have a financial interest in any contract, subcontract, or agreement with respect to an assisted activity; or have a financial interest in the proceeds derived from an assisted activity, either for him or herself or for those with whom he or she has immediate family or business ties, during his or her tenure or during the one-year period following his or her tenure.



Other Requirements

- Review the Sub-Grant Agreement
- Review HUD regulations
- Things like:
 - Confidentiality
 - Drug-free workplace
 - Equal opportunity
 - Affirmative outreach



Data Collection & Reporting



Data Reporting

- HUD's current ESG annual report is the Consolidated Annual Performance Evaluation Report (CAPER).
- This report currently ties in to the Consolidated Plan and Annual Action Plans.
- Also now required to submit an additional ESG-specific "Transitional" CAPER.
- IFA submits this report on behalf of all ESG activities.
- Pulls from information mostly already submitted by subgrantees—financial information, plus aggregate client information from HMIS system
- DV agencies must submit additional separate report, since we can't pull aggregate client information.
- IFA submits the CAPER in HUD's IDIS system.
- HUD is still developing their annual reporting for ESG; likely to expand further.



(separate slides)

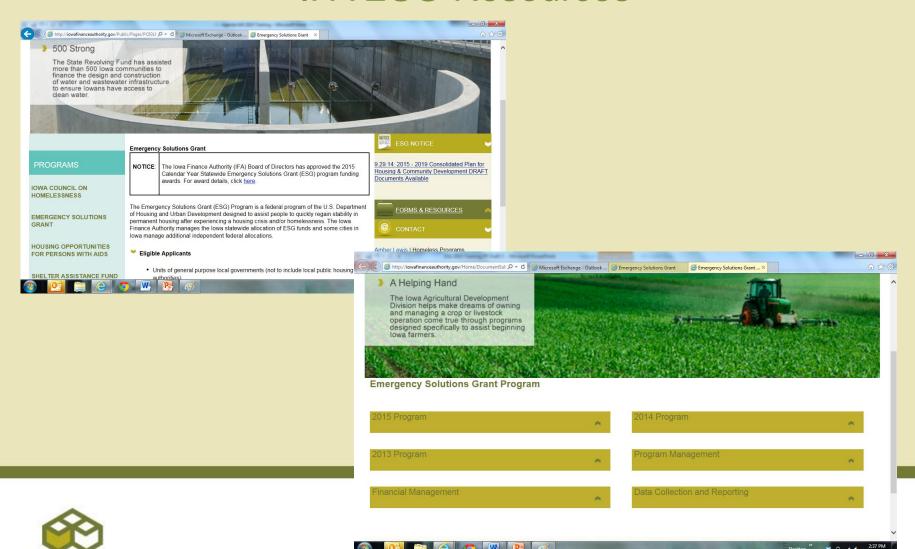


ESG Resources

- Where can you go for key information?
- Where can you ask questions of HUD?
- What resources do you need to locate for your program?
- What resources could IFA help to develop?



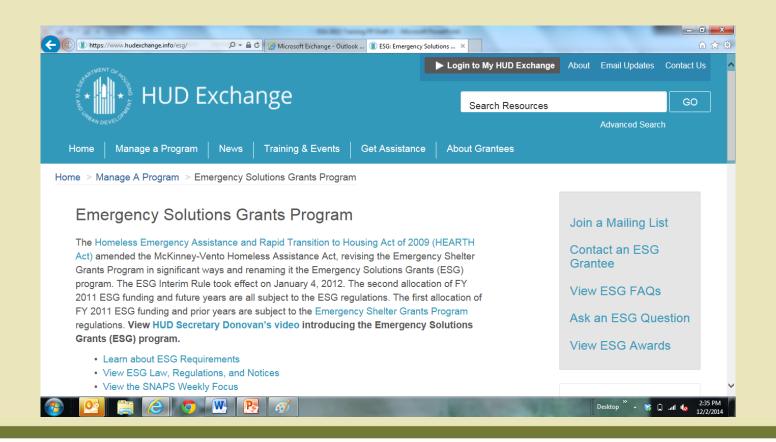
IFA ESG Resources



IOWA FINANCE

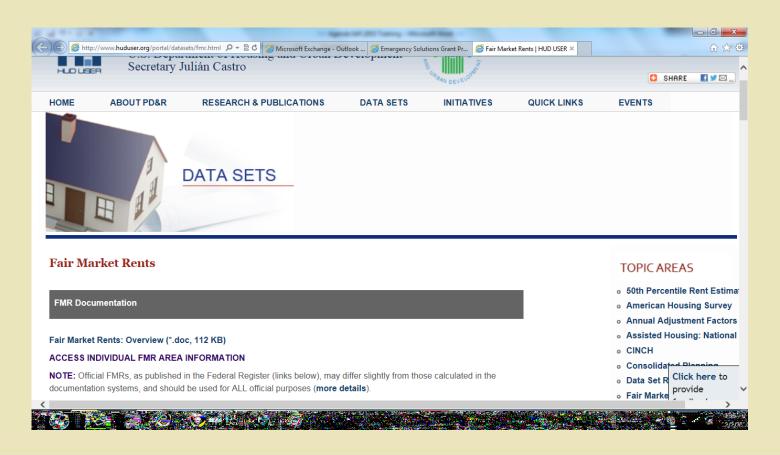
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HUD ESG Resources



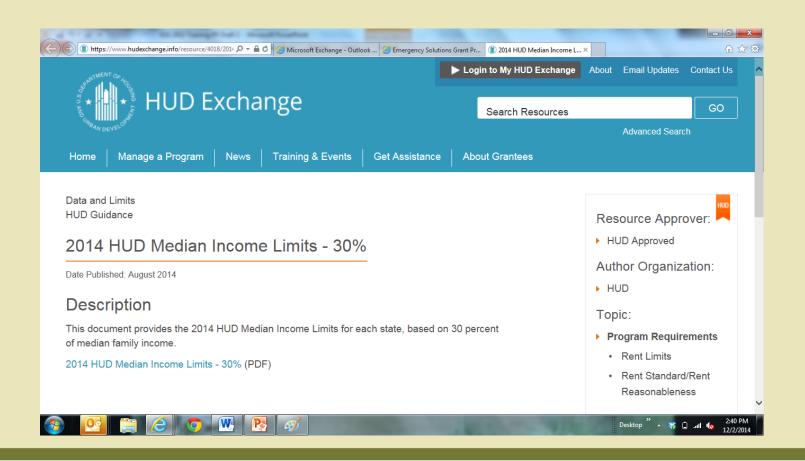


HUD Fair Market Rent





HUD Median Income Limits for ESG





IowaHousingSearch.org



- Have you been to training?
- Are you using it to help program participants locate housing?



Questions

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